

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

CHRISTINA LAING )  
1645 NW 795 Rd. )  
Bates City, MO 64011 )

and )

JESSICA SMITH )  
18510 Borland Rd. )  
Higginsville, MO 64037 )

Plaintiffs, )

vs. )

THE CITY OF BLUE SPRINGS, )  
MISSOURI )

Serve: )

Jacqueline Sommer, )  
City Attorney )  
City of Blue Springs )  
903 West Main Street )  
Blue Springs, MO 64015 )

Defendant. )

Case No. \_\_\_\_\_

Division \_\_\_\_\_

**JURY TRIAL DEMANDED**

**PETITION FOR DAMAGES**

COME NOW Plaintiffs, by and through their undersigned counsel, and state the following for their causes of action against Defendant.

**PLAINTIFFS**

1. Plaintiff Christina Laing is an individual over the age of twenty-one (21) years old and is a resident of Bates City, Missouri.

EXHIBIT

**A**

2. Plaintiff Jessica Smith is an individual over the age of twenty-one (21) years old and is a resident of Higginsville, Missouri.

### **DEFENDANT**

3. Defendant the City of Blue Springs, Missouri (hereinafter referred to as "Blue Springs") is a Missouri municipal corporation which, at all times mentioned herein, was qualified and authorized to do business in the State of Missouri and to sue and be sued in accordance with Missouri law.

4. At all times relevant hereto, Defendant Blue Springs was acting by and through its agents, servants, and/or employees, actual or ostensible, each of whom were acting within the course and scope of their employment.

5. Defendant Blue Springs was, at all pertinent times, the employer of Plaintiffs.

### **JURISDICTION AND VENUE**

6. Jurisdiction and venue are proper pursuant to Mo. Rev. St., 508.040 because both Plaintiffs and Defendant are residents of Missouri. Furthermore, the action occurred in Eastern Jackson County, Missouri.

7. The FLSA authorizes court actions by private parties to recover damages for violation of the FLSA's wage and hour provisions. Jurisdiction over Plaintiffs' FLSA claims is based upon 29 U.S.C. § 216(b).

### **FACTS AND ALLEGATIONS**

8. Both Plaintiffs are current police dispatchers for the Defendant City of Blue Springs, Missouri.

9. Defendant Blue Springs schedules each dispatcher to work one week of thirty-six (36) hours, followed by one week of forty-four (44) hours.

10. Plaintiffs and other dispatchers are paid twice a month, for every two weeks worked.

11. Plaintiffs worked over forty hours every other workweek and were therefore entitled to overtime pay for the hours they worked in excess of forty hours, in the amount of one and one-half times the regular rate of pay pursuant to both the Fair Labor Standards Act (29 U.S.C. § 207(a)) and the Missouri Minimum Wage Law (Mo. Stat. Ann. § 290.505.1).

12. Despite the requirements of the FLSA and MMWL, Defendant Blue Springs failed to pay Plaintiffs the overtime rate required by law for the hours they worked in excess of forty (40) hours in a workweek.

13. Instead, Blue Springs would manually remove four hours from Plaintiffs' timesheets for the forty-four (44) hour workweeks, and move those hours onto the next pay period that had a thirty-six (36) hour workweek, in an effort to hide the overtime Plaintiffs worked.

**COUNT I**  
**VIOLATION OF THE FAIR LABOR STANDARDS ACT OF 1938**

14. Plaintiffs hereby adopt and incorporate the above paragraphs as though fully set forth herein.

15. At all times relevant hereto, Plaintiffs have been entitled to the rights, protections, and benefits provided under the FLSA, 29 U.S.C. §§ 201 *et seq.*

16. The FLSA regulates, among other things, the payment of overtime wages to employees who are engaged in interstate commerce, or engaged in the production of goods for commerce or employed in an enterprise engaged in commerce or in the production of goods for commerce. 29 U.S.C. § 207(a)(1).

17. The overtime wage provisions set forth in § 201, et seq., of the FLSA apply to Defendant Blue Springs. At all relevant times, Defendant Blue Springs was the employer of Plaintiffs and was engaged in commerce and/or the production of goods for commerce within the meaning of 29 U.S.C. §§ 206(a) and 207(a).

18. At all times relevant hereto, Defendant Blue Springs was Plaintiffs' "employer" within the meaning of the FLSA. 29 U.S.C. § 203(d).

19. At all times relevant hereto, Plaintiffs were Defendants Blue Springs' "employees" within the meaning of the FLSA. 29 U.S.C. § 203(e).

20. Section 13 of the FLSA, codified at 29 U.S.C. § 213, exempts certain categories of employees from overtime pay obligations. None of the FLSA exemptions apply to Plaintiffs. *Id.*

21. Pursuant to the FLSA, employees are entitled to be compensated at a rate of not less than one and one-half times the regular rate at which such employees are employed for all work performed in excess of 40 hours in a workweek. 29 U.S.C. § 207(a).

22. Defendant Blue Springs violated the FLSA by failing to pay for overtime. In the course of perpetrating these unlawful practices, Blue Springs has also failed to keep accurate records of all hours worked by its dispatcher employees.

23. Defendant Blue Springs' failure to pay overtime compensation, as described above, has been willful and was not the result of a good faith contest or dispute.

24. Defendant Blue Springs willfully and intentionally engaged in a persistent pattern and practice of violation of the FLSA by failing and refusing to pay any overtime compensation to Plaintiffs and its dispatcher employees, and by instead editing Plaintiffs' timesheets to move the overtime hours worked to a different pay period.

25. Plaintiffs are entitled to damages equal to the mandated overtime premium pay within the three years preceding the filing of the Complaint, plus periods of equitable tolling, because Defendant Blue Springs acted willfully and knew, or showed reckless disregard for whether its conduct was prohibited by the FLSA, and dissuaded employees from asserting their legal rights by misinforming employees about those rights.

26. Defendant Blue Springs has failed to act in good faith or with reasonable grounds to believe that its actions and actions and omissions were not a violation of the FLSA, and as a result thereof, Plaintiffs are entitled to recover an award of liquidated damages in an amount equal to the amount of unpaid overtime pay permitted by 29 U.S.C. § 216(b). Alternatively, should the Court find that Plaintiffs are not entitled to liquidated damages, Plaintiffs are entitled to an award of prejudgment interest at the applicable legal rate.

27. As a result of the aforesaid willful violations of the FLSA's overtime pay provisions, overtime compensation has been unlawfully withheld by Defendant Blue Springs from Plaintiffs. Accordingly, Defendant Blue Springs is liable under 29 U.S.C. § 216(b), together with an additional amount as liquidated damages, pre- and post-judgment interest, reasonable attorneys' fees, and costs of this action.

WHEREFORE, Plaintiffs demand judgment against Defendant Blue Springs and pray for: (1) compensatory damages; (2) liquidated damages; (3) attorneys' fees and costs as allowed by Section 16(b) of the FLSA; (4) pre-judgment and post-judgment interest as provided by law; and (5) such other relief as the Court deems just and proper.

## **COUNT II**

### **VIOLATION OF THE MISSOURI MINIMUM WAGE LAW**

28. Plaintiffs hereby adopt and incorporate the above paragraphs as though fully set forth herein.

29. Plaintiffs assert this cause of action pursuant to the Missouri Minimum Wage Law ("MMWL"), Mo. Stat. Ann. § 290.500 *et seq.*

30. At all relevant times hereto, Plaintiffs have been entitled to the rights, protections, and benefits provided under the MMWL.

31. The MMWL regulates, among other things, the payment of overtime wages by employers, subject to limited exceptions not applicable herein. See Mo. Stat. Ann. §§ 290.500(3-4), 290.505.1.

32. The MMWL should be construed in accordance with its provisions and those of the FLSA. Specifically, the Missouri Department of Labor has promulgated

regulations providing that except as otherwise provided by Missouri law, the interpretation and enforcement of the MMWL follows the FLSA and its companion regulations. See 8 C.S.R. §30-4.010(1).

33. At all relevant times, Defendant Blue Springs was the “employer” of Plaintiffs within the meaning of the MMWL. See Mo. Stat. Ann. §§ 290.500(3-4).

34. At all relevant times, Plaintiffs were Defendant Blue Springs’ “employees” within the meaning of the MMWL. See Mo. Stat. Ann. § 290.500(3).

35. Although the MMWL contains some exceptions (or exemptions) from overtime pay, none of those exceptions (or exemptions) apply here. See Mo. Stat. Ann. §290.500(3). Plaintiffs are covered, non-exempt employees within the meaning of the MMWL.

36. Pursuant to the MMWL, employees are entitled to be compensated at a rate of not less than one and one-half times the regular rate at which such employees are employed for all work performed in excess of 40 hours in a workweek. Mo. Stat. Ann. § 290.505.1

37. Defendant Blue Springs violated the MMWL by failing to pay for overtime. In the course of perpetrating these unlawful practices, Blue Springs has also failed to keep accurate records of all hours worked by its dispatcher employees.

38. Defendant Blue Springs’ failure to pay overtime compensation, as described above, has been willful and was not the result of a good faith contest or dispute.

39. Defendant Blue Springs willfully and intentionally engaged in a persistent pattern and practice of violation of the MMWL by failing and refusing to pay any overtime compensation to Plaintiffs and its dispatcher employees, and by instead editing Plaintiffs' timesheets to move the overtime hours worked to a different pay period.

40. Plaintiffs are entitled to damages equal to all unpaid overtime wages due within two (2) years preceding the filing of this Complaint, plus periods of equitable tolling, along with an additional equal amount as liquidated damages, less any amount actually paid to the employees by Defendant. See Mo. Stat. Ann. § 290.527.

41. Plaintiffs are also entitled to an award of pre-judgment and post-judgment interest at the applicable legal rate.

42. Defendant Blue Springs is also liable to Plaintiffs for costs and reasonable attorney fees incurred in this action. See Mo. Stat. Ann. § 290.527.

WHEREFORE, Plaintiffs demand judgment against Defendant Blue Springs and pray for: (1) compensatory damages; (2) liquidated damages; (3) attorneys' fees and costs as allowed by Mo. Stat. Ann. § 290.527.; (4) pre-judgment and post-judgment interest as provided by law; and (5) such other relief as the Court deems just and proper.

### **COUNT III** **UNJUST ENRICHMENT**

43. Plaintiffs hereby adopt and incorporate the above paragraphs as though fully set forth herein.



44. Defendant Blue Springs benefited from the work performed by Plaintiffs during the times they worked beyond forty (40) hours per week without receiving overtime compensation for such work.

45. Plaintiffs reasonably expected to be compensated in accordance with the law by Defendant Blue Springs.

46. Defendant Blue Springs intentionally and with bad faith refused to pay Plaintiffs for time worked in excess of forty hours per week at the proper rate.

47. Defendant Blue Springs' purposeful and wrongful policy and practice of inaccurately recording the hours worked by Plaintiffs by manually moving overtime hours from one pay period to the next operated to the detriment of Plaintiffs.

48. Defendant Blue Springs' acceptance and retention of the benefit of the Plaintiffs' unpaid labor was inequitable and resulted in Defendant Blue Springs being unjustly enriched.

WHEREFORE, Plaintiffs demand judgment against Defendant Blue Springs and pray for: (1) compensatory damages; (2) an Order that Blue Springs disgorge the value of its ill-gained benefits to Plaintiffs; (3) pre-judgment and post-judgment interest as provided by law; and (4) such other relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL OF ALL ISSUES**

49. Plaintiffs in the above-entitled cause demand a trial by jury.

Respectfully submitted,

HUMPHREY, FARRINGTON & McCLAIN, P.C.

/s/ 

Andrew K. Smith #60485

Nichelle L. Oxley #65839

221 W. Lexington, Suite 400

Independence, Missouri 64050

Telephone: (816) 836-5050

Facsimile: (816) 836-8966

[nlo@hfmlegal.com](mailto:nlo@hfmlegal.com)

**ATTORNEY FOR PLAINTIFFS**

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

CHRISTINA LAING )  
1645 NW 795 Rd. )  
Bates City, MO 64011 )

and )

JESSICA SMITH )  
18510 Borland Rd. )  
Higginsville, MO 64037 )

Plaintiffs, )

vs. )

THE CITY OF BLUE SPRINGS, )  
MISSOURI )

Serve: )

Jacqueline Sommer, City Attorney )  
City of Blue Springs )  
903 West Main Street )  
Blue Springs, MO 64015 )

Defendant. )

Case No. \_\_\_\_\_

Division \_\_\_\_\_

**JURY TRIAL DEMANDED**

**MOTION FOR APPOINTMENT OF  
PRIVATE PROCESS SERVER**

COMES NOW Plaintiffs, by and through counsel, and pursuant to Local Rule 4.9 of Jackson County Court Rules, hereby moves for the appointment of HPS Process Service & Investigations, Inc.:

Jan Adams	PPS19-0001
Michelle L Adams	PPS19-0002
Roger Adams	PPS19-0003
Bobby Ali	PPS19-0004
Lakeita Allen	PPS19-

	0005
Sandra M Allen	PPS19-0006
Victor Aponte	PPS19-0007
Joshua Aragon	PPS19-0008
Brandon Aschenbrenner	PPS19-0009

Erica Austin	PPS19-0010
Kali A Baltazar	PPS19-0011
Joseph L Baska	PPS19-0012
Carrington L Bell	PPS19-0013
George Bell	PPS19-

	0014
Ryan Black	PPS19-0015
Shanna Blackwell	PPS19-0016
Dianna J Blea	PPS19-0017
Richard J Blea	PPS19-0018
Robert Blixt	PPS19-0019
Brent Bohnoff	PPS19-0020
David Braxton	PPS19-0021
Charles Bridges	PPS19-0022
Donnie C Briley	PPS19-0023
Kathy A Broom	PPS19-0024
Dan Brouillete	PPS19-0025
Douglas S Brower	PPS19-0026
Kelley Brown	PPS19-0028
Kenneth H Brown, Jr.	PPS19-0027
Nicholas R Bull	PPS19-0029
Jarrett M Bullock	PPS19-0030
Ashley Bumgardner	PPS19-0031
James Burke	PPS19-0032
Randy D Burrow	PPS19-0033
Gary Burt	PPS19-0034
William J Caputo	PPS19-0035
Charles Casey	PPS19-0036

George L Castillo	PPS19-0037
Sonja R Chailland	PPS19-0038
Gary Chatham	PPS19-0039
Glen Cobb	PPS19-0040
Kenneth V Condrey	PPS19-0041
Sharon R Condrey	PPS19-0042
Kathleen Cook	PPS19-0043
William R Cooper	PPS19-0044
Catherine Cornellier	PPS19-0045
Wilberto Correa	PPS19-0046
Alterick S Davenport	PPS19-0047
Duane D Day	PPS19-0048
Gerald Deadwyler	PPS19-0049
Robert E Delacy, III	PPS19-0050
Robert E Delacy, Jr.	PPS19-0051
Dominic DellaPorte	PPS19-0052
Ricardo Delpratt	PPS19-0053
John Dippenworth	PPS19-0064
Alexander C Djaine	PPS19-0065
Claudia A Dohn	PPS19-0066
Dale Dorning	PPS19-0067
Jadeena Earle	PPS19-0068
Abel A Emiru	PPS19-

	0069
David S Felter	PPS19-0070
William F Ferrell	PPS19-0228
Robert D Finley	PPS19-0071
Travis Foster	PPS19-0072
Christopher Fowler	PPS19-0073
James Frago	PPS19-0074
John Frago	PPS19-0075
Andrew L Garza	PPS19-0231
Louis Gerrick	PPS19-0054
Matthew Gilmore	PPS19-0055
Steven D Glenn	PPS19-0056
Ronda Godard	PPS19-0057
Adam Golden	PPS19-0058
Bradley Gordon	PPS19-0059
Tom Gorgone	PPS19-0060
Gabriella Gourdin	PPS19-0061
Christina M Gregory	PPS19-0062
Charles R Gunning	PPS19-0063
Darnell Hamilton	PPS19-0076
Kimberly Hamilton	PPS19-0077
Alan Hancock	PPS19-0078
Eric Hann	PPS19-0079

Timothy S Hansen	PPS19-0080
Christy Hartline	PPS19-0081
Larry Haynes	PPS19-0082
Douglas E Hays	PPS19-0083
Grace Hazell	PPS19-0084
Richard P Heimerich, Jr.	PPS19-0085
Stephen Heitz	PPS19-0086
Charles Helms	PPS19-0087
Austen Hendrickson	PPS19-0088
Wendy L Henrich	PPS19-0089
Jesse J Hernandez	PPS19-0090
Michael Hibler	PPS19-0091
Anthonio Hightower	PPS19-0092
Wendy K Hilgenberg	PPS19-0238
James M Hise	PPS19-0093
Gary F Hodges	PPS19-0094
Brian K Hollen	PPS19-0095
Bob Holyk	PPS19-0096
Roman Holyk	PPS19-0097
Ulonda G Howard	PPS19-0098
Martin J Hueckel	PPS19-0099
William B Humble	PPS19-0100
George Illidge	PPS19-

	0101
Frank James	PPS19-0102
Matthew J Jankowski	PPS19-0103
Betty A Johnson	PPS19-0104
Christina M Johnson	PPS19-0105
Edward Johnson	PPS19-0106
Randy Johnson	PPS19-0107
Michael A Jones	PPS19-0108
Haile Kahssa	PPS19-0109
Kenneth J Kearney	PPS19-0110
Michael Keatina	PPS19-0111
Gerald Keeley	PPS19-0112
Wyman T Kroft	PPS19-0113
Jeff Kuenzi	PPS19-0114
Jo Ann Lane	PPS19-0115
John M Laukaitis	PPS19-0116
Joshua Lee	PPS19-0117
Rick V Leeds	PPS19-0118
Kristie S Lewis	PPS19-0119
John D Lichtenegger	PPS19-0120
Bert Lott	PPS19-0121
Robert Manning	PPS19-0123
Roger Martucci	PPS19-0124

William Lu Maye	PPS19-0122
Michael J McMahon	PPS19-0125
Jerry Melber	PPS19-0126
Arsalan Memon	PPS19-0127
Jenna Mendoza	PPS19-0128
Matthew A Millhollin	PPS19-0129
Vivian G Mitchell	PPS19-0130
Carlos A Moreno	PPS19-0131
Kelly Murski	PPS19-0132
Andrew Myers	PPS19-0263
Frederick M Myers	PPS19-0264
James G Myers	PPS19-0265
Stephanie Myers	PPS19-0266
Paul Nardizz	PPS19-0133
Wendy Neff	PPS19-0134
Jillian Newkirk	PPS19-0135
Brian Newton	PPS19-0136
Jeremy L Nicholas	PPS19-0268
Michael Noble	PPS19-0137
Trinity Olson	PPS19-0138
John Pappas	PPS19-0139
Cynthia Paris	PPS19-0140
George R Perry, Jr.	PPS19-

	0142
Janet R Perry	PPS19-0141
Kacie Phelps	PPS19-0143
Vincent Piazza	PPS19-0158
Timothy Pinney	PPS19-0159
Jason S Plumley	PPS19-0160
Craig Podgurshi, Jr	PPS19-0161
Rocellious D Pope	PPS19-0162
Anastasia Quinquit	PPS19-0163
Charles J Reardon	PPS19-0164
Derek L Reddick	PPS19-0165
Angela Reed	PPS19-0166
Christopher Reed	PPS19-0145
Edward Reed	PPS19-0146
Ernie Rice	PPS19-0147
Karen L Rice	PPS19-0148
Debra Rios	PPS19-0149
Randy Rober	PPS19-0150
David M Roberts	PPS19-0336
Patricia Roberts	PPS19-0337
Richard Robex	PPS19-0151
Jery Robinson	PPS19-0152
Antonio Roque	PPS19-0153

Ethel A Ross	PPS19-0154
Richard C Ross	PPS19-0155
Edna Russell	PPS19-0156
Mark Russell, Jr.	PPS19-0157
John T Sadler, Jr	PPS19-0167
Ligno Sanchez	PPS19-0168
Virginia L Saxon	PPS19-0169
Nathaniel Scott	PPS19-0170
Joe Sherrod	PPS19-0171
Cory Shields	PPS19-0172
Mark O Shiver	PPS19-0173
Eric Shumate	PPS19-0174
Andrew Siteps	PPS19-0175
Jeremy S Small	PPS19-0176
Bryan Smith	PPS19-0177
Monica Smith	PPS19-0178
Timofey A Somoylenko	PPS19-0179
Anthony Spada	PPS19-0180
Melissa Spencer	PPS19-0181
Jamie P Stallo	PPS19-0182
Marc A Starks	PPS19-0183
Barbara J Stelc	PPS19-0184
Kelvin Stinyard	PPS19-

	0185
Randy Stone	PPS19-0186
Haley Stratton	PPS19-0187
Berham B Tassaw	PPS19-0188
Jeffrey Teitel	PPS19-0189
Perry Thomas	PPS19-0190
Robert H Thomas	PPS19-0191
William W Thomas	PPS19-0192
Vanessa Thompson	PPS19-0193
Christina Tiffany	PPS19-0194
Gabriel E Trantum	PPS19-0195
Jacob Trantum	PPS19-0196
Paul G Turpen	PPS19-0197
Margarita Vasquez	PPS19-0198
Robert E Vick, II	PPS19-0199
Kasey Vink	PPS19-0200
Brad Votaw	PPS19-0201
Ambiko Wallace	PPS19-0202
Daniel R Ward	PPS19-0203
Vancem Warrem, Sr.	PPS19-0204
Kaylan Welborn	PPS19-0205
Gregory M Willing	PPS19-0206
Deborah A Wilson	PPS19-0207

Elmer W Wilson	PPS19-0208
Mitch A Wirth	PPS19-0209
Deborah Woodhouse	PPS19-0210
Jerry Wooten	PPS19-0211
Edwin E Young	PPS19-0212
Sarah Zirakian	PPS19-0213
Felycia Aranda	PPS19-0533
Mark Avery	PPS19-0534
Teresa Bailly	PPS19-0535
Mike Barry	PPS19-0536
Robert Bassler	PPS19-0537
Laura Beckham	PPS19-0538
Ann Bollino	PPS19-0539
Joshua Brown	PPS19-0540
Maurice Burton, Sr.	PPS19-0541
Anna Canole	PPS19-0542
Trenia Cherry	PPS19-0543
John R Choate	PPS19-0544
Rick M McClain	PPS19-0545
John A Clor	PPS19-0546
Kathleen V Clor	PPS19-0547
Emma Cole	PPS19-0548
Theodore	PPS19-

Cordasco	0549
Karen Crohan	PPS19-0550
Laura Crum	PPS19-0551
Bryce E Dearborn	PPS19-0552
Kathleen DiNunno	PPS19-0553
Dennis Duflinger	PPS19-0554
Donald C Eska, Jr.	PPS19-0555
Leticia Estrada	PPS19-0556
Robert D Fairbanks	PPS19-0557
Flojetta Fitzgerald	PPS19-0558
Stephen H Folcher	PPS19-0559
Christine Foran	PPS19-0560
Ryan D Fortune	PPS19-0561
Richard Gerber	PPS19-0562
Paul Gizel	PPS19-0563
Sinai Gonzalez	PPS19-0564
David Hahn	PPS19-0565
Anthony Hatcher	PPS19-0566
Frances Hatcher	PPS19-0567
Erich T Hein	PPS19-0568
Leonard Horseman	PPS19-0569
Donna Jo King	PPS19-0570
Mike Johnson	PPS19-0571

Louis Jones	PPS19-0572
Samuel Jones, Jr.	PPS19-0573
Jeff Keyton	PPS19-0574
Kenneth J. Klewicki	PPS19-0575
Thomas R. Kroll	PPS19-0576
Robert G. Maluuuk, Jr.	PPS19-0577
Matthews J Manlich	PPS19-0578
David Martin	PPS19-0579
Michael Meade	PPS19-0580
Eric Mendenhall	PPS19-0581
James O Miller, Jr.	PPS19-0582
Chris Miranda	PPS19-0583
Carla Monegain	PPS19-0584
Emmanuel F Morales	PPS19-0585
Michael S Morison	PPS19-0586
Ly Nguyen	PPS19-0587
Keith Niziankiewicz	PPS19-0588
Craig Palmer	PPS19-0589
Douglas W Patterson	PPS19-0590
Jaron Perkins	PPS19-0591
Terrance Perry	PPS19-0592
Gregory Piazza	PPS19-0593
Brian T Pierce	PPS19-

	0594
John Pontry	PPS19-0595
Nancy Porter	PPS19-0596
Andre S Powell	PPS19-0597
Galen Quinn	PPS19-0598
Cheryl R Richey	PPS19-0599
Eric Rubin	PPS19-0600
Melissa Ruiz	PPS19-0601
Lee H Russell	PPS19-0602
Barbara Scott	PPS19-0603

Steven Stosur	PPS19-0604
Michael Talone	PPS19-0605
Lisa Thomas	PPS19-0606
Scott L Thomas	PPS19-0607
Walter Thomas	PPS19-0608
Stephen M Troutz	PPS19-0609
Michele VonEisengrein	PPS19-0610
Joseph T Wachowski	PPS19-0611
Michael Walton	PPS19-0612
Roger White	PPS19-

	0613
Ann Wixom	PPS19-0614
Sandra Yade	PPS19-0615
Niel Young	PPS19-0616
Gina Zappia	PPS19-0617
Kim Zappia	PPS19-0618
Richard Zechiel	PPS19-0619
Dennis Dahlberg	PPS19-0691

as private process servers in the above-captioned matter. In support of said motion, Plaintiffs state that the above-named individuals are on the Court's list of approved process servers and the information contained in their applications and affidavits on file is current and still correct.

Respectfully submitted,

HUMPHREY, FARRINGTON & McCLAIN, P.C.

/s/ Nichelle L. Oxley

Nichelle L. Oxley #65839

221 W. Lexington, Suite 400

Independence, Missouri 64050

Telephone: (816) 836-5050

Facsimile: (816) 836-8966

[nlo@hfmlegal.com](mailto:nlo@hfmlegal.com)

**ATTORNEY FOR PLAINTIFFS**



**ORDER FOR APPOINTMENT OF PRIVATE PROCESS SERVER**

It is hereby ordered that Plaintiffs' Motion for Appointment of Private Process Server is sustained and the above named individuals are hereby appointed to serve process in the above captioned matter.

DATE: \_\_\_\_\_

\_\_\_\_\_  
Judge or Circuit Clerk

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

CHRISTINA LAING )  
1645 NW 795 Rd. )  
Bates City, MO 64011 )

and )

JESSICA SMITH )  
18510 Borland Rd. )  
Higginsville, MO 64037 )

Plaintiffs, )

vs. )

THE CITY OF BLUE SPRINGS, )  
MISSOURI )

Serve: )

Jacqueline Sommer, City Attorney )  
City of Blue Springs )  
903 West Main Street )  
Blue Springs, MO 64015 )

Defendant. )

Case No. \_\_\_\_\_

Division \_\_\_\_\_

**JURY TRIAL DEMANDED**

**MOTION FOR APPOINTMENT OF  
PRIVATE PROCESS SERVER**

COMES NOW Plaintiffs, by and through counsel, and pursuant to Local Rule 4.9 of Jackson County Court Rules, hereby moves for the appointment of HPS Process Service & Investigations, Inc.:

Jan Adams	PPS19-0001
Michelle L Adams	PPS19-0002
Roger Adams	PPS19-0003
Bobby Ali	PPS19-0004
Lakeita Allen	PPS19-

	0005
Sandra M Allen	PPS19-0006
Victor Aponte	PPS19-0007
Joshua Aragon	PPS19-0008
Brandon Aschenbrenner	PPS19-0009

Erica Austin	PPS19-0010
Kali A Baltazar	PPS19-0011
Joseph L Baska	PPS19-0012
Carrington L Bell	PPS19-0013
George Bell	PPS19-

	0014
Ryan Black	PPS19-0015
Shanna Blackwell	PPS19-0016
Dianna J Blea	PPS19-0017
Richard J Blea	PPS19-0018
Robert Blixt	PPS19-0019
Brent Bohnoff	PPS19-0020
David Braxton	PPS19-0021
Charles Bridges	PPS19-0022
Donnie C Briley	PPS19-0023
Kathy A Broom	PPS19-0024
Dan Brouillete	PPS19-0025
Douglas S Brower	PPS19-0026
Kelley Brown	PPS19-0028
Kenneth H Brown, Jr.	PPS19-0027
Nicholas R Bull	PPS19-0029
Jarrett M Bullock	PPS19-0030
Ashley Bumgardner	PPS19-0031
James Burke	PPS19-0032
Randy D Burrow	PPS19-0033
Gary Burt	PPS19-0034
William J Caputo	PPS19-0035
Charles Casey	PPS19-0036

George L Castillo	PPS19-0037
Sonja R Chailland	PPS19-0038
Gary Chatham	PPS19-0039
Glen Cobb	PPS19-0040
Kenneth V Condrey	PPS19-0041
Sharon R Condrey	PPS19-0042
Kathleen Cook	PPS19-0043
William R Cooper	PPS19-0044
Catherine Cornellier	PPS19-0045
Wilberto Correa	PPS19-0046
Alterick S Davenport	PPS19-0047
Duane D Day	PPS19-0048
Gerald Deadwyler	PPS19-0049
Robert E Delacy, III	PPS19-0050
Robert E Delacy, Jr.	PPS19-0051
Dominic DellaPorte	PPS19-0052
Ricardo Delpratt	PPS19-0053
John Dippenworth	PPS19-0064
Alexander C Djaine	PPS19-0065
Claudia A Dohn	PPS19-0066
Dale Dorning	PPS19-0067
Jadeena Earle	PPS19-0068
Abel A Emiru	PPS19-

	0069
David S Felter	PPS19-0070
William F Ferrell	PPS19-0228
Robert D Finley	PPS19-0071
Travis Foster	PPS19-0072
Christopher Fowler	PPS19-0073
James Frago	PPS19-0074
John Frago	PPS19-0075
Andrew L Garza	PPS19-0231
Louis Gerrick	PPS19-0054
Matthew Gilmore	PPS19-0055
Steven D Glenn	PPS19-0056
Ronda Godard	PPS19-0057
Adam Golden	PPS19-0058
Bradley Gordon	PPS19-0059
Tom Gorgone	PPS19-0060
Gabriella Gourdin	PPS19-0061
Christina M Gregory	PPS19-0062
Charles R Gunning	PPS19-0063
Darnell Hamilton	PPS19-0076
Kimberly Hamilton	PPS19-0077
Alan Hancock	PPS19-0078
Eric Hann	PPS19-0079

Timothy S Hansen	PPS19-0080
Christy Hartline	PPS19-0081
Larry Haynes	PPS19-0082
Douglas E Hays	PPS19-0083
Grace Hazell	PPS19-0084
Richard P Heimerich, Jr.	PPS19-0085
Stephen Heitz	PPS19-0086
Charles Helms	PPS19-0087
Austen Hendrickson	PPS19-0088
Wendy L Henrich	PPS19-0089
Jesse J Hernandez	PPS19-0090
Michael Hibler	PPS19-0091
Anthonio Hightower	PPS19-0092
Wendy K Hilgenberg	PPS19-0238
James M Hise	PPS19-0093
Gary F Hodges	PPS19-0094
Brian K Hollen	PPS19-0095
Bob Holyk	PPS19-0096
Roman Holyk	PPS19-0097
Ulonda G Howard	PPS19-0098
Martin J Hueckel	PPS19-0099
William B Humble	PPS19-0100
George Illidge	PPS19-

	0101
Frank James	PPS19-0102
Matthew J Jankowski	PPS19-0103
Betty A Johnson	PPS19-0104
Christina M Johnson	PPS19-0105
Edward Johnson	PPS19-0106
Randy Johnson	PPS19-0107
Michael A Jones	PPS19-0108
Haile Kahssa	PPS19-0109
Kenneth J Kearney	PPS19-0110
Michael Keatina	PPS19-0111
Gerald Keeley	PPS19-0112
Wyman T Kroft	PPS19-0113
Jeff Kuenzi	PPS19-0114
Jo Ann Lane	PPS19-0115
John M Laukaitis	PPS19-0116
Joshua Lee	PPS19-0117
Rick V Leeds	PPS19-0118
Kristie S Lewis	PPS19-0119
John D Lichtenegger	PPS19-0120
Bert Lott	PPS19-0121
Robert Manning	PPS19-0123
Roger Martucci	PPS19-0124

William Lu Maye	PPS19-0122
Michael J McMahon	PPS19-0125
Jerry Melber	PPS19-0126
Arsalan Memon	PPS19-0127
Jenna Mendoza	PPS19-0128
Matthew A Millhollin	PPS19-0129
Vivian G Mitchell	PPS19-0130
Carlos A Moreno	PPS19-0131
Kelly Murski	PPS19-0132
Andrew Myers	PPS19-0263
Frederick M Myers	PPS19-0264
James G Myers	PPS19-0265
Stephanie Myers	PPS19-0266
Paul Nardizz	PPS19-0133
Wendy Neff	PPS19-0134
Jillian Newkirk	PPS19-0135
Brian Newton	PPS19-0136
Jeremy L Nicholas	PPS19-0268
Michael Noble	PPS19-0137
Trinity Olson	PPS19-0138
John Pappas	PPS19-0139
Cynthia Paris	PPS19-0140
George R Perry, Jr.	PPS19-

	0142
Janet R Perry	PPS19-0141
Kacie Phelps	PPS19-0143
Vincent Piazza	PPS19-0158
Timothy Pinney	PPS19-0159
Jason S Plumley	PPS19-0160
Craig Podgurshi, Jr	PPS19-0161
Rocellious D Pope	PPS19-0162
Anastasia Quinquit	PPS19-0163
Charles J Reardon	PPS19-0164
Derek L Reddick	PPS19-0165
Angela Reed	PPS19-0166
Christopher Reed	PPS19-0145
Edward Reed	PPS19-0146
Ernie Rice	PPS19-0147
Karen L Rice	PPS19-0148
Debra Rios	PPS19-0149
Randy Rober	PPS19-0150
David M Roberts	PPS19-0336
Patricia Roberts	PPS19-0337
Richard Robex	PPS19-0151
Jery Robinson	PPS19-0152
Antonio Roque	PPS19-0153

Ethel A Ross	PPS19-0154
Richard C Ross	PPS19-0155
Edna Russell	PPS19-0156
Mark Russell, Jr.	PPS19-0157
John T Sadler, Jr	PPS19-0167
Ligno Sanchez	PPS19-0168
Virginia L Saxon	PPS19-0169
Nathaniel Scott	PPS19-0170
Joe Sherrod	PPS19-0171
Cory Shields	PPS19-0172
Mark O Shiver	PPS19-0173
Eric Shumate	PPS19-0174
Andrew Siteps	PPS19-0175
Jeremy S Small	PPS19-0176
Bryan Smith	PPS19-0177
Monica Smith	PPS19-0178
Timofey A Somoylenko	PPS19-0179
Anthony Spada	PPS19-0180
Melissa Spencer	PPS19-0181
Jamie P Stallo	PPS19-0182
Marc A Starks	PPS19-0183
Barbara J Stelc	PPS19-0184
Kelvin Stinyard	PPS19-

	0185
Randy Stone	PPS19-0186
Haley Stratton	PPS19-0187
Berham B Tassaw	PPS19-0188
Jeffrey Teitel	PPS19-0189
Perry Thomas	PPS19-0190
Robert H Thomas	PPS19-0191
William W Thomas	PPS19-0192
Vanessa Thompson	PPS19-0193
Christina Tiffany	PPS19-0194
Gabriel E Trantum	PPS19-0195
Jacob Trantum	PPS19-0196
Paul G Turpen	PPS19-0197
Margarita Vasquez	PPS19-0198
Robert E Vick, II	PPS19-0199
Kasey Vink	PPS19-0200
Brad Votaw	PPS19-0201
Ambiko Wallace	PPS19-0202
Daniel R Ward	PPS19-0203
Vancem Warrem, Sr.	PPS19-0204
Kaylan Welborn	PPS19-0205
Gregory M Willing	PPS19-0206
Deborah A Wilson	PPS19-0207

Elmer W Wilson	PPS19-0208
Mitch A Wirth	PPS19-0209
Deborah Woodhouse	PPS19-0210
Jerry Wooten	PPS19-0211
Edwin E Young	PPS19-0212
Sarah Zirakian	PPS19-0213
Felycia Aranda	PPS19-0533
Mark Avery	PPS19-0534
Teresa Bailly	PPS19-0535
Mike Barry	PPS19-0536
Robert Bassler	PPS19-0537
Laura Beckham	PPS19-0538
Ann Bollino	PPS19-0539
Joshua Brown	PPS19-0540
Maurice Burton, Sr.	PPS19-0541
Anna Canole	PPS19-0542
Trenia Cherry	PPS19-0543
John R Choate	PPS19-0544
Rick M McClain	PPS19-0545
John A Clor	PPS19-0546
Kathleen V Clor	PPS19-0547
Emma Cole	PPS19-0548
Theodore	PPS19-

Cordasco	0549
Karen Crohan	PPS19-0550
Laura Crum	PPS19-0551
Bryce E Dearborn	PPS19-0552
Kathleen DiNunno	PPS19-0553
Dennis Duflinger	PPS19-0554
Donald C Eska, Jr.	PPS19-0555
Leticia Estrada	PPS19-0556
Robert D Fairbanks	PPS19-0557
Flojetta Fitzgerald	PPS19-0558
Stephen H Folcher	PPS19-0559
Christine Foran	PPS19-0560
Ryan D Fortune	PPS19-0561
Richard Gerber	PPS19-0562
Paul Gizel	PPS19-0563
Sinai Gonzalez	PPS19-0564
David Hahn	PPS19-0565
Anthony Hatcher	PPS19-0566
Frances Hatcher	PPS19-0567
Erich T Hein	PPS19-0568
Leonard Horseman	PPS19-0569
Donna Jo King	PPS19-0570
Mike Johnson	PPS19-0571

Louis Jones	PPS19-0572
Samuel Jones, Jr.	PPS19-0573
Jeff Keyton	PPS19-0574
Kenneth J. Klewicki	PPS19-0575
Thomas R. Kroll	PPS19-0576
Robert G. Maluuuk, Jr.	PPS19-0577
Matthews J Manlich	PPS19-0578
David Martin	PPS19-0579
Michael Meade	PPS19-0580
Eric Mendenhall	PPS19-0581
James O Miller, Jr.	PPS19-0582
Chris Miranda	PPS19-0583
Carla Monegain	PPS19-0584
Emmanuel F Morales	PPS19-0585
Michael S Morison	PPS19-0586
Ly Nguyen	PPS19-0587
Keith Niziankiewicz	PPS19-0588
Craig Palmer	PPS19-0589
Douglas W Patterson	PPS19-0590
Jaron Perkins	PPS19-0591
Terrance Perry	PPS19-0592
Gregory Piazza	PPS19-0593
Brian T Pierce	PPS19-

	0594
John Pontry	PPS19-0595
Nancy Porter	PPS19-0596
Andre S Powell	PPS19-0597
Galen Quinn	PPS19-0598
Cheryl R Richey	PPS19-0599
Eric Rubin	PPS19-0600
Melissa Ruiz	PPS19-0601
Lee H Russell	PPS19-0602
Barbara Scott	PPS19-0603

Steven Stosur	PPS19-0604
Michael Talone	PPS19-0605
Lisa Thomas	PPS19-0606
Scott L Thomas	PPS19-0607
Walter Thomas	PPS19-0608
Stephen M Troutz	PPS19-0609
Michele VonEisengrein	PPS19-0610
Joseph T Wachowski	PPS19-0611
Michael Walton	PPS19-0612
Roger White	PPS19-

	0613
Ann Wixom	PPS19-0614
Sandra Yade	PPS19-0615
Niel Young	PPS19-0616
Gina Zappia	PPS19-0617
Kim Zappia	PPS19-0618
Richard Zechiel	PPS19-0619
Dennis Dahlberg	PPS19-0691

as private process servers in the above-captioned matter. In support of said motion, Plaintiffs state that the above-named individuals are on the Court's list of approved process servers and the information contained in their applications and affidavits on file is current and still correct.

Respectfully submitted,

HUMPHREY, FARRINGTON & McCLAIN, P.C.

/s/ Nichelle L. Oxley

Nichelle L. Oxley #65839

221 W. Lexington, Suite 400

Independence, Missouri 64050

Telephone: (816) 836-5050

Facsimile: (816) 836-8966

[nlo@hfmlegal.com](mailto:nlo@hfmlegal.com)

**ATTORNEY FOR PLAINTIFFS**

**ORDER FOR APPOINTMENT OF PRIVATE PROCESS SERVER**

It is hereby ordered that Plaintiffs' Motion for Appointment of Private Process Server is sustained and the above named individuals are hereby appointed to serve process in the above captioned matter.

DATE: \_\_\_\_\_

\_\_\_\_\_  
Judge or Circuit Clerk



**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

CHRISTINA LAING )  
1645 NW 795 Rd. )  
Bates City, MO 64011 )

and )

JESSICA SMITH )  
18510 Borland Rd. )  
Higginsville, MO 64037 )

Plaintiffs, )

vs. )

THE CITY OF BLUE SPRINGS, )  
MISSOURI )

Serve: )

Jacqueline Sommer, City Attorney )  
City of Blue Springs )  
903 West Main Street )  
Blue Springs, MO 64015 )

Defendant. )

Case No. \_\_\_\_\_

Division \_\_\_\_\_

**JURY TRIAL DEMANDED**

**MOTION FOR APPOINTMENT OF  
PRIVATE PROCESS SERVER**

COMES NOW Plaintiffs, by and through counsel, and pursuant to Local Rule 4.9 of Jackson County Court Rules, hereby moves for the appointment of HPS Process Service & Investigations, Inc.:

Jan Adams	PPS19-0001
Michelle L Adams	PPS19-0002
Roger Adams	PPS19-0003
Bobby Ali	PPS19-0004
Lakeita Allen	PPS19-

	0005
Sandra M Allen	PPS19-0006
Victor Aponte	PPS19-0007
Joshua Aragon	PPS19-0008
Brandon Aschenbrenner	PPS19-0009

Erica Austin	PPS19-0010
Kali A Baltazar	PPS19-0011
Joseph L Baska	PPS19-0012
Carrington L Bell	PPS19-0013
George Bell	PPS19-

	0014
Ryan Black	PPS19-0015
Shanna Blackwell	PPS19-0016
Dianna J Blea	PPS19-0017
Richard J Blea	PPS19-0018
Robert Blixt	PPS19-0019
Brent Bohnoff	PPS19-0020
David Braxton	PPS19-0021
Charles Bridges	PPS19-0022
Donnie C Briley	PPS19-0023
Kathy A Broom	PPS19-0024
Dan Brouillete	PPS19-0025
Douglas S Brower	PPS19-0026
Kelley Brown	PPS19-0028
Kenneth H Brown, Jr.	PPS19-0027
Nicholas R Bull	PPS19-0029
Jarrett M Bullock	PPS19-0030
Ashley Bumgardner	PPS19-0031
James Burke	PPS19-0032
Randy D Burrow	PPS19-0033
Gary Burt	PPS19-0034
William J Caputo	PPS19-0035
Charles Casey	PPS19-0036

George L Castillo	PPS19-0037
Sonja R Chailland	PPS19-0038
Gary Chatham	PPS19-0039
Glen Cobb	PPS19-0040
Kenneth V Condrey	PPS19-0041
Sharon R Condrey	PPS19-0042
Kathleen Cook	PPS19-0043
William R Cooper	PPS19-0044
Catherine Cornellier	PPS19-0045
Wilberto Correa	PPS19-0046
Alterick S Davenport	PPS19-0047
Duane D Day	PPS19-0048
Gerald Deadwyler	PPS19-0049
Robert E Delacy, III	PPS19-0050
Robert E Delacy, Jr.	PPS19-0051
Dominic DellaPorte	PPS19-0052
Ricardo Delpratt	PPS19-0053
John Dippenworth	PPS19-0064
Alexander C Djaine	PPS19-0065
Claudia A Dohn	PPS19-0066
Dale Dorning	PPS19-0067
Jadeena Earle	PPS19-0068
Abel A Emiru	PPS19-

	0069
David S Felter	PPS19-0070
William F Ferrell	PPS19-0228
Robert D Finley	PPS19-0071
Travis Foster	PPS19-0072
Christopher Fowler	PPS19-0073
James Frago	PPS19-0074
John Frago	PPS19-0075
Andrew L Garza	PPS19-0231
Louis Gerrick	PPS19-0054
Matthew Gilmore	PPS19-0055
Steven D Glenn	PPS19-0056
Ronda Godard	PPS19-0057
Adam Golden	PPS19-0058
Bradley Gordon	PPS19-0059
Tom Gorgone	PPS19-0060
Gabriella Gourdin	PPS19-0061
Christina M Gregory	PPS19-0062
Charles R Gunning	PPS19-0063
Darnell Hamilton	PPS19-0076
Kimberly Hamilton	PPS19-0077
Alan Hancock	PPS19-0078
Eric Hann	PPS19-0079

Timothy S Hansen	PPS19-0080
Christy Hartline	PPS19-0081
Larry Haynes	PPS19-0082
Douglas E Hays	PPS19-0083
Grace Hazell	PPS19-0084
Richard P Heimerich, Jr.	PPS19-0085
Stephen Heitz	PPS19-0086
Charles Helms	PPS19-0087
Austen Hendrickson	PPS19-0088
Wendy L Henrich	PPS19-0089
Jesse J Hernandez	PPS19-0090
Michael Hibler	PPS19-0091
Anthonio Hightower	PPS19-0092
Wendy K Hilgenberg	PPS19-0238
James M Hise	PPS19-0093
Gary F Hodges	PPS19-0094
Brian K Hollen	PPS19-0095
Bob Holyk	PPS19-0096
Roman Holyk	PPS19-0097
Ulonda G Howard	PPS19-0098
Martin J Hueckel	PPS19-0099
William B Humble	PPS19-0100
George Illidge	PPS19-

	0101
Frank James	PPS19-0102
Matthew J Jankowski	PPS19-0103
Betty A Johnson	PPS19-0104
Christina M Johnson	PPS19-0105
Edward Johnson	PPS19-0106
Randy Johnson	PPS19-0107
Michael A Jones	PPS19-0108
Haile Kahssa	PPS19-0109
Kenneth J Kearney	PPS19-0110
Michael Keatina	PPS19-0111
Gerald Keeley	PPS19-0112
Wyman T Kroft	PPS19-0113
Jeff Kuenzi	PPS19-0114
Jo Ann Lane	PPS19-0115
John M Laukaitis	PPS19-0116
Joshua Lee	PPS19-0117
Rick V Leeds	PPS19-0118
Kristie S Lewis	PPS19-0119
John D Lichtenegger	PPS19-0120
Bert Lott	PPS19-0121
Robert Manning	PPS19-0123
Roger Martucci	PPS19-0124

William Lu Maye	PPS19-0122
Michael J McMahon	PPS19-0125
Jerry Melber	PPS19-0126
Arsalan Memon	PPS19-0127
Jenna Mendoza	PPS19-0128
Matthew A Millhollin	PPS19-0129
Vivian G Mitchell	PPS19-0130
Carlos A Moreno	PPS19-0131
Kelly Murski	PPS19-0132
Andrew Myers	PPS19-0263
Frederick M Myers	PPS19-0264
James G Myers	PPS19-0265
Stephanie Myers	PPS19-0266
Paul Nardizz	PPS19-0133
Wendy Neff	PPS19-0134
Jillian Newkirk	PPS19-0135
Brian Newton	PPS19-0136
Jeremy L Nicholas	PPS19-0268
Michael Noble	PPS19-0137
Trinity Olson	PPS19-0138
John Pappas	PPS19-0139
Cynthia Paris	PPS19-0140
George R Perry, Jr.	PPS19-

	0142
Janet R Perry	PPS19-0141
Kacie Phelps	PPS19-0143
Vincent Piazza	PPS19-0158
Timothy Pinney	PPS19-0159
Jason S Plumley	PPS19-0160
Craig Podgurshi, Jr	PPS19-0161
Rocellious D Pope	PPS19-0162
Anastasia Quinquit	PPS19-0163
Charles J Reardon	PPS19-0164
Derek L Reddick	PPS19-0165
Angela Reed	PPS19-0166
Christopher Reed	PPS19-0145
Edward Reed	PPS19-0146
Ernie Rice	PPS19-0147
Karen L Rice	PPS19-0148
Debra Rios	PPS19-0149
Randy Rober	PPS19-0150
David M Roberts	PPS19-0336
Patricia Roberts	PPS19-0337
Richard Robex	PPS19-0151
Jery Robinson	PPS19-0152
Antonio Roque	PPS19-0153

Ethel A Ross	PPS19-0154
Richard C Ross	PPS19-0155
Edna Russell	PPS19-0156
Mark Russell, Jr.	PPS19-0157
John T Sadler, Jr	PPS19-0167
Ligno Sanchez	PPS19-0168
Virginia L Saxon	PPS19-0169
Nathaniel Scott	PPS19-0170
Joe Sherrod	PPS19-0171
Cory Shields	PPS19-0172
Mark O Shiver	PPS19-0173
Eric Shumate	PPS19-0174
Andrew Siteps	PPS19-0175
Jeremy S Small	PPS19-0176
Bryan Smith	PPS19-0177
Monica Smith	PPS19-0178
Timofey A Somoylenko	PPS19-0179
Anthony Spada	PPS19-0180
Melissa Spencer	PPS19-0181
Jamie P Stallo	PPS19-0182
Marc A Starks	PPS19-0183
Barbara J Stelc	PPS19-0184
Kelvin Stinyard	PPS19-

	0185
Randy Stone	PPS19-0186
Haley Stratton	PPS19-0187
Berham B Tassaw	PPS19-0188
Jeffrey Teitel	PPS19-0189
Perry Thomas	PPS19-0190
Robert H Thomas	PPS19-0191
William W Thomas	PPS19-0192
Vanessa Thompson	PPS19-0193
Christina Tiffany	PPS19-0194
Gabriel E Trantum	PPS19-0195
Jacob Trantum	PPS19-0196
Paul G Turpen	PPS19-0197
Margarita Vasquez	PPS19-0198
Robert E Vick, II	PPS19-0199
Kasey Vink	PPS19-0200
Brad Votaw	PPS19-0201
Ambiko Wallace	PPS19-0202
Daniel R Ward	PPS19-0203
Vancem Warrem, Sr.	PPS19-0204
Kaylan Welborn	PPS19-0205
Gregory M Willing	PPS19-0206
Deborah A Wilson	PPS19-0207

Elmer W Wilson	PPS19-0208
Mitch A Wirth	PPS19-0209
Deborah Woodhouse	PPS19-0210
Jerry Wooten	PPS19-0211
Edwin E Young	PPS19-0212
Sarah Zirakian	PPS19-0213
Felycia Aranda	PPS19-0533
Mark Avery	PPS19-0534
Teresa Bailly	PPS19-0535
Mike Barry	PPS19-0536
Robert Bassler	PPS19-0537
Laura Beckham	PPS19-0538
Ann Bollino	PPS19-0539
Joshua Brown	PPS19-0540
Maurice Burton, Sr.	PPS19-0541
Anna Canole	PPS19-0542
Trenia Cherry	PPS19-0543
John R Choate	PPS19-0544
Rick M McClain	PPS19-0545
John A Clor	PPS19-0546
Kathleen V Clor	PPS19-0547
Emma Cole	PPS19-0548
Theodore	PPS19-

Cordasco	0549
Karen Crohan	PPS19-0550
Laura Crum	PPS19-0551
Bryce E Dearborn	PPS19-0552
Kathleen DiNunno	PPS19-0553
Dennis Duflinger	PPS19-0554
Donald C Eska, Jr.	PPS19-0555
Leticia Estrada	PPS19-0556
Robert D Fairbanks	PPS19-0557
Flojetta Fitzgerald	PPS19-0558
Stephen H Folcher	PPS19-0559
Christine Foran	PPS19-0560
Ryan D Fortune	PPS19-0561
Richard Gerber	PPS19-0562
Paul Gizel	PPS19-0563
Sinai Gonzalez	PPS19-0564
David Hahn	PPS19-0565
Anthony Hatcher	PPS19-0566
Frances Hatcher	PPS19-0567
Erich T Hein	PPS19-0568
Leonard Horseman	PPS19-0569
Donna Jo King	PPS19-0570
Mike Johnson	PPS19-0571

Louis Jones	PPS19-0572
Samuel Jones, Jr.	PPS19-0573
Jeff Keyton	PPS19-0574
Kenneth J. Klewicki	PPS19-0575
Thomas R. Kroll	PPS19-0576
Robert G. Maluuuk, Jr.	PPS19-0577
Matthews J Manlich	PPS19-0578
David Martin	PPS19-0579
Michael Meade	PPS19-0580
Eric Mendenhall	PPS19-0581
James O Miller, Jr.	PPS19-0582
Chris Miranda	PPS19-0583
Carla Monegain	PPS19-0584
Emmanuel F Morales	PPS19-0585
Michael S Morison	PPS19-0586
Ly Nguyen	PPS19-0587
Keith Niziankiewicz	PPS19-0588
Craig Palmer	PPS19-0589
Douglas W Patterson	PPS19-0590
Jaron Perkins	PPS19-0591
Terrance Perry	PPS19-0592
Gregory Piazza	PPS19-0593
Brian T Pierce	PPS19-

	0594
John Pontry	PPS19-0595
Nancy Porter	PPS19-0596
Andre S Powell	PPS19-0597
Galen Quinn	PPS19-0598
Cheryl R Richey	PPS19-0599
Eric Rubin	PPS19-0600
Melissa Ruiz	PPS19-0601
Lee H Russell	PPS19-0602
Barbara Scott	PPS19-0603

Steven Stosur	PPS19-0604
Michael Talone	PPS19-0605
Lisa Thomas	PPS19-0606
Scott L Thomas	PPS19-0607
Walter Thomas	PPS19-0608
Stephen M Troutz	PPS19-0609
Michele VonEisengrein	PPS19-0610
Joseph T Wachowski	PPS19-0611
Michael Walton	PPS19-0612
Roger White	PPS19-

	0613
Ann Wixom	PPS19-0614
Sandra Yade	PPS19-0615
Niel Young	PPS19-0616
Gina Zappia	PPS19-0617
Kim Zappia	PPS19-0618
Richard Zechiel	PPS19-0619
Dennis Dahlberg	PPS19-0691

as private process servers in the above-captioned matter. In support of said motion, Plaintiffs state that the above-named individuals are on the Court's list of approved process servers and the information contained in their applications and affidavits on file is current and still correct.

Respectfully submitted,

HUMPHREY, FARRINGTON & McCLAIN, P.C.

/s/ Nichelle L. Oxley

Nichelle L. Oxley #65839

221 W. Lexington, Suite 400

Independence, Missouri 64050

Telephone: (816) 836-5050

Facsimile: (816) 836-8966

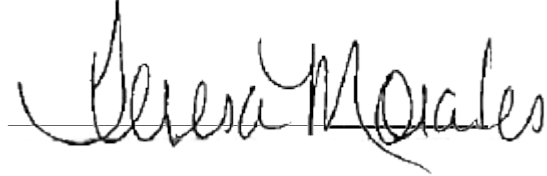
[nlo@hfmlegal.com](mailto:nlo@hfmlegal.com)

**ATTORNEY FOR PLAINTIFFS**

**ORDER FOR APPOINTMENT OF PRIVATE PROCESS SERVER**

It is hereby ordered that Plaintiffs' Motion for Appointment of Private Process Server is sustained and the above named individuals are hereby appointed to serve process in the above captioned matter.

DATE: 07-Nov-2019

A handwritten signature in black ink, appearing to read "Geneva Morales", written over a horizontal line.

DEPUTY COURT ADMINISTRATOR




# IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: MARCO A ROLDAN	Case Number: 1916-CV29923
Plaintiff/Petitioner: CHRISTINA LAING	Plaintiff's/Petitioner's Attorney/Address NICHELLE LEY CLOSSON 221 WEST LEXINGTON AVENUE SUITE 400 INDEPENDENCE, MO 64050
Defendant/Respondent: THE CITY OF BLUE SPRINGS, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Other Miscellaneous Actions	

(Date File Stamp)

## Summons in Civil Case

<p><b>The State of Missouri to:</b> THE CITY OF BLUE SPRINGS, MISSOURI</p> <p>Alias:</p> <p>JACQUELINE SOMMER CITY ATTORNEY 903 WEST MAIN STREET BLUE SPRINGS, MO 64015</p> <p><b>COURT SEAL OF</b></p>  <p><b>JACKSON COUNTY</b></p>	<p><b>PRIVATE PROCESS SERVER</b></p> <p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p>07-NOV-2019 Date</p> <p>Further Information:</p> <p><i>[Signature]</i> Clerk</p>
--	--

<p align="center"><b>Sheriff's or Server's Return</b></p> <p><b>Note to serving officer:</b> Summons should be returned to the court within thirty days after the date of issue.</p> <p>I certify that I have served the above summons by: (check one)</p> <p><input type="checkbox"/> delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.</p> <p><input type="checkbox"/> leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.</p> <p><input type="checkbox"/> (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).</p> <p><input type="checkbox"/> other _____.</p> <p>Served at _____ (address)</p> <p>in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).</p> <p>_____ Printed Name of Sheriff or Server</p> <p>_____ Signature of Sheriff or Server</p> <p align="center"><b>Must be sworn before a notary public if not served by an authorized officer:</b></p> <p>Subscribed and sworn to before me on _____ (date).</p> <p>My commission expires: _____ (date) _____ (date)</p> <p align="center">(Seal)</p> <p align="center">Notary Public</p>	
---	--

<p><b>Sheriff's Fees</b></p> <p>Summons \$ _____</p> <p>Non Est \$ _____</p> <p>Sheriff's Deputy Salary</p> <p>Supplemental Surcharge \$ 10.00</p> <p>Mileage \$ _____ ( _____ miles @ \$. _____ per mile)</p> <p><b>Total</b> \$ _____</p> <p>A copy of the summons and a copy of the petition must be served on <b>each</b> Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.</p>
--



## **SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION**

Under the Missouri e-filing system now utilized by the 16<sup>th</sup> Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

**CHRISTINA LAING,**

**PLAINTIFF(S),**

**VS.**

**CASE NO. 1916-CV29923  
DIVISION 16**

**THE CITY OF BLUE SPRINGS, MISSOURI,**

**DEFENDANT(S).**

**NOTICE OF CASE MANAGEMENT CONFERENCE FOR CIVIL CASE  
AND ORDER FOR MEDIATION**

---

NOTICE IS HEREBY GIVEN that a Case Management Conference will be held with the Honorable **MARCO A ROLDAN** on **22-APR-2020** in **DIVISION 16** at **08:30 AM**. All Applications for Continuance of a Case Management Conference should be filed on or before Wednesday of the week prior to the case management setting. Applications for Continuance of a Case Management Conference shall comply with Supreme Court Rule and 16<sup>th</sup> Cir. R. 34.1. Continuance of a Case Management Conference will only be granted for good cause shown because it is the desire of the Court to meet with counsel and parties in all cases within the first 4 months that a case has been on file. All counsel and parties are directed to check Case.NET on the 16<sup>th</sup> Judicial Circuit web site at [www.16thcircuit.org](http://www.16thcircuit.org) after filing an application for continuance to determine whether or not it has been granted.

A lead attorney of record must be designated for each party as required by Local Rule 3.5.1. A separate pleading designating the lead attorney of record shall be filed by each party as described in Local Rule 3.5.2. The parties are advised that if they do not file a separate pleading designating lead counsel, even in situations where there is only one attorney representing the party, JIS will not be updated by civil records department, and copies of orders will be sent to the address currently shown in JIS. Civil Records does not update attorney information from answers or other pleadings. The Designation of Lead Attorney pleading shall contain the name of lead counsel, firm name, mailing address, phone number, FAX number and E-mail address of the attorney who is lead counsel.

At the Case Management Conference, counsel should be prepared to address at least the following:

- a. A trial setting;
- b. Expert Witness Disclosure Cutoff Date;
- c. A schedule for the orderly preparation of the case for trial;
- d. Any issues which require input or action by the Court;
- e. The status of settlement negotiations.

### **MEDIATION**

The parties are ordered to participate in mediation pursuant to Supreme Court Rule 17. Mediation shall be completed within 10 months after the date the case is filed for complex cases, and 6 months after the date the case is filed for other circuit cases, unless otherwise ordered by the Court. Each party shall personally appear at the mediation and participate in the process. In the event a party does not have the authority to enter into a settlement, then a representative of the entity that does have actual authority to enter into a settlement on behalf of the party shall also personally attend the mediations with the party.

The parties shall confer and select a mutually agreeable person to act as mediator in this case. If the parties are unable to agree on a mediator the court will appoint a mediator at the Case Management Conference.

Each party shall pay their respective pro-rata cost of the mediation directly to the mediator.

### **POLICIES/PROCEDURES**

Please refer to the Court's web page [www.16thcircuit.org](http://www.16thcircuit.org) for division policies and procedural information listed by each judge.

**/S/ MARCO A ROLDAN**

**MARCO A ROLDAN, Circuit Judge**

### **Certificate of Service**

This is to certify that a copy of the foregoing was electronic noticed, faxed, emailed and/or mailed or hand delivered to the plaintiff with the delivery of the file-stamped copy of the petition. It is further certified that a copy of the foregoing will be served with the summons on each defendant named in this action.

#### **Attorney for Plaintiff(s):**

NICHILLE LEY CLOSSON, 221 WEST LEXINGTON AVENUE, SUITE 400,  
INDEPENDENCE, MO 64050

#### **Defendant(s):**

THE CITY OF BLUE SPRINGS, MISSOURI

Dated: 07-NOV-2019

MARY A. MARQUEZ  
Court Administrator

## AFFIDAVIT OF SERVICE

State of Missouri

County of Jackson

Circuit Court

Case Number: 1916-CV29923

Plaintiff/Petitioner:  
**CHRISTINA LANG, et. al.**

vs.

Defendant/Respondent:  
**THE CITY OF BLUE SPRINGS, MISSOURI**

Received by HPS Process Service & Investigations to be served on The City of Blue Springs, Missouri c/o Jacqueline Sommer, City Attorney, 903 West Main Street, Blue Springs, MO 64015.

I, ROBERT E. VICK, II, being duly sworn, depose and say that on the **14th** day of November, 2019 at 4:06 pm, I:

Served the within named establishment by delivering a true copy of **Summons in Civil Case; Notice of Case Management Conference for Civil Case and Order for Mediation; Petition for Damages; and Motion and Order for Appointment of Private Process Server to Jacqueline Summer, City Attorney at the address of 903 West Main Street, Blue Springs, MO 64015.**

I am over the age of eighteen, and have no interest in the above action.

Subscribed and Sworn to before me on the 19 day  
of November, 2019 by the affiant who is  
personally known to me.

NOTARY PUBLIC



A. MOON  
My Commission Expires  
February 24, 2021  
Clay County, Missouri  
Commission #13452192

  
ROBERT E. VICK, II  
Process Server

HPS Process Service & Investigations  
www.hpsprocess.com  
1669 Jefferson  
Kansas City, MO 64108  
(800) 796-9559

Our Job Serial Number: HAT-2019021480



# IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: MARCO A ROLDAN	Case Number: 1916-CV29923
Plaintiff/Petitioner: CHRISTINA LAING	Plaintiff's/Petitioner's Attorney/Address NICHELLE LEY CLOSSON 221 WEST LEXINGTON AVENUE SUITE 400 INDEPENDENCE, MO 64050
Defendant/Respondent: THE CITY OF BLUE SPRINGS, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Other Miscellaneous Actions	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: **THE CITY OF BLUE SPRINGS, MISSOURI**

Alias:

## PRIVATE PROCESS SERVER

JACQUELINE SOMMER  
CITY ATTORNEY  
903 WEST MAIN STREET  
BLUE SPRINGS, MO 64015

COURT SEAL OF



JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

07-NOV-2019  
Date

*[Signature]*  
Clerk

Further Information:

### Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.

☒ (for service on a corporation) delivering a copy of the summons and a copy of the petition to JACQUELINE SOMMER (name) CITY ATTORNEY (title).

☐ other \_\_\_\_\_

Served at 903 W. MAIN BLUE SPRINGS, MO 64015 (address)  
 in JACKSON (County/City of St. Louis), MO, on 11-14-19 (date) at 4:06pm (time).

Printed Name of Sheriff or Server ROBERT VICK

Signature of Sheriff or Server *[Signature]*

Must be sworn before a notary public if not served by an authorized officer:

A. MOON  
(Seal) Commission Expires  
February 24, 2021  
Clay County

Subscribed and sworn to before me on

My commission expires:

Date

(date).

Notary Public

Sheriff's Fee Session #13452192

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.